

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

William Ortega Mainato,)
Petitioner,) Case No. _____
v.)
PATRICIA HYDE, Field Office Director,)
MICHAEL KROL, HSI New England Special)
Agent in Charge, and TODD LYONS, Acting)
Director U.S. Immigrations and Customs)
Enforcement, and KRISTI NOEM, U.S. Secretary)
of Homeland Security,)
Respondents.)

)

INTRODUCTION

1. Petitioner, William Ortega Mainato, is a Ecuadorian national whose date of birth is 11/02/1994. He entered the United States without inspection in September of 2020 and currently has a pending Asylum petition before the Boston Immigration Court. On information and belief, he was unlawfully detained by federal immigration agents on May 28, 2025.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that he was unlawfully detained and order his release.

JURISDICTION

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides and was detained in Framingham, MA, and on

information and belief is detained in the District of Massachusetts. The ICE Locator currently states that he is detained under the jurisdiction of the Boston field office, with instructions to call 781 359 7500 for more information. This number is not manned and no information is being provided through this number.

PARTIES AND FACTS ALLEGED

6. The Petitioner, Luis Minchala Guaman, is an Ecuadorian national who, prior to being unlawfully detained, resided in Framingham, MA, with his wife and 6 year old child.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the U.S. Secretary of Homeland Security.
11. All respondents are named in their official capacities.
12. Petitioner is a Ecuadorian national with a pending asylum application. He has attended all Court hearings and check ins, since his case was docketed with the immigration court on 6/2/2022. On information and belief, he was detained without cause by U.S. Immigration and Customs Enforcement agents on May 28, 2025, while a passenger in a vehicle. He was riding in a landscaping van which was stopped by agents and there was no cause provided for his detention.
13. On information and belief, per the online ICE Detainee Locator, Petitioner is currently in custody in the District of Massachusetts, and one or more of the Respondents is his

immediate custodian.

CLAIMS FOR RELIEF

COUNT ONE
Violation of Fifth Amendment Right to Due Process

1. On information and belief, Petitioner is currently being arrested and detained by federal agents without cause and in violation of his constitutional rights to due process of law.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
- (4) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

Syrie D. Fried
Syrie D. Fried
Good Schneider Cormier
Fried & Brooks
83 Atlantic Avenue
Boston, MA 02110
617-523-5933

Counsel for Petitioner

Dated: May 30, 2025

